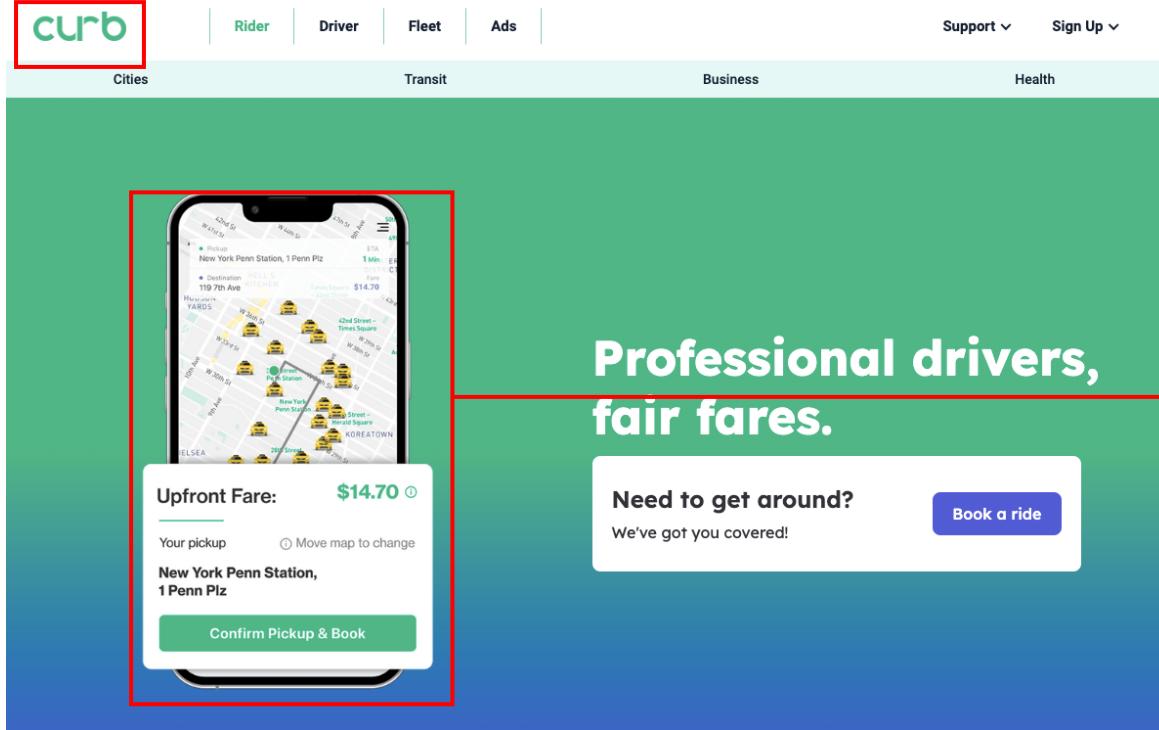


EXHIBIT B

U.S. Patent No. 9,261,365 v. Curb Mobility

1. Claim Chart

Claim	Analysis
<p>[1.P] A method for receiving location information at a positional information device, the method comprising:</p>	<p>Curb Mobility (“Company”) performs and induces others to perform a method for receiving location information at a positional information device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides a Curb application, which, when installed on a user’s smartphone (“positional information device”), connects a user with local taxi fleets registered on the Curb application for booking taxi rides and handling payments. Further, while requesting or booking a taxi, the location data of the nearby taxi drivers, along with the expected time to arrive at the pick-up location or user’s location, are displayed on the Curb application (“receiving location information”).</p>



The image shows a screenshot of the Curb website. At the top, there is a navigation bar with the Curb logo, 'Rider', 'Driver', 'Fleet', 'Ads', 'Support', and 'Sign Up'. Below the navigation bar, there are four categories: 'Cities', 'Transit', 'Business', and 'Health'. The 'Business' category is highlighted with a green background. On the left side, there is a smartphone displaying the Curb app interface. The app shows a map of New York City with several yellow Curb vehicles marked. A callout box on the app displays the text 'Upfront Fare: \$14.70' and 'New York Penn Station, 1 Penn Plz'. Below the app, there is a green text area with the heading 'Professional drivers, fair fares.' and a sub-section 'Need to get around?'. A red box highlights the text 'Location data: We collect precise or approximate location data from a user's mobile device if enabled by the user to do so. For drivers, CML collects this data either from CML equipment installed in the vehicles or when the Curb® driver App is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile devices. For passengers, CML'.

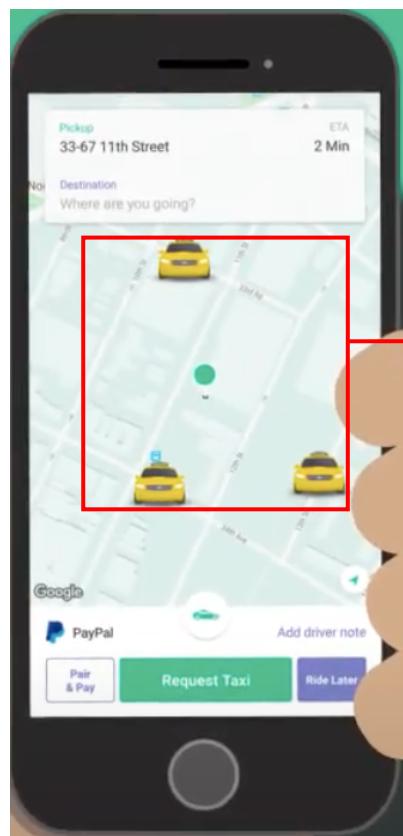
Source: <https://www.gocurb.com/> (annotated)

2. Data created during use of our Platform or Services, which includes:

Location data: We collect precise or approximate location data from a user's mobile device if enabled by the user to do so. For drivers, CML collects this data either from CML equipment installed in the vehicles or when the Curb® driver App is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile devices. For passengers, CML

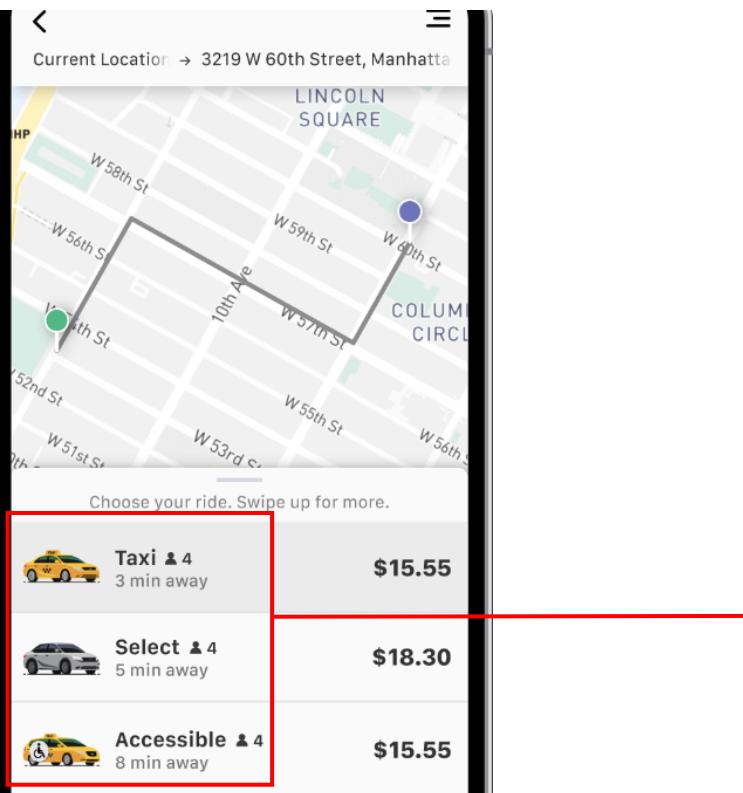
Source: <https://www.gocurb.com/privacy>

positional information device



Locations of nearby
taxi drivers

Source: <https://www.youtube.com/watch?v=Y2ztLexoyDk> at 0:12 (annotated)

 <p>Source: https://www.gocurb.com/ (annotated)</p>	<p>Time for the taxis to arrive at the pickup or user's location</p>
<p>[1.1] sending a request from a requesting positional information device to a</p>	<p>Company performs and induces others to perform the step of sending a request from a requesting positional information device to a server for at least one address stored in at least one sending positional information device, the request including a first identifier of the requesting positional information device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>

server for at least one address stored in at least one sending positional information device, the request including a first identifier of the requesting positional information device;	<p>For example, both the user and the driver create an account on the Curb application such that the application collects the user's and the driver's device data such as unique device identifiers ("identifier"). When the user requests or books a ride ("sending a request") on the Curb application, the ride request is forwarded to the nearby drivers, who accept to confirm the ride booking through the application. Upon accepting the request, the real-time location of the driver's mobile device ("sending positional information device") is shared with the user such that the user tracks the real-time location of the driver ("at least one address stored in at least one sending positional information device"). Therefore, it would be apparent to a person having ordinary skill in the art that the user's mobile device ("requesting positional information device") sends the ride request to a server, and the ride request includes the identifier of the user's device ("including a first identifier of the requesting positional information device").</p> <p>Device data: We may collect data about the devices used to access our Platform or Services, including the hardware models, device IP addresses, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data and mobile network data.</p> <p>Source: https://www.gocurb.com/privacy</p> <p>2. Data created during use of our Platform or Services, which includes:</p> <p>Location data: We collect precise or approximate location data from a user's mobile device if enabled by the user to do so. For drivers, CML collects this data either from CML equipment installed in the vehicles or when the Curb® driver App is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile devices. For passengers, CML</p> <p>Source: https://www.gocurb.com/privacy</p>
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Request and pay for taxis with Curb

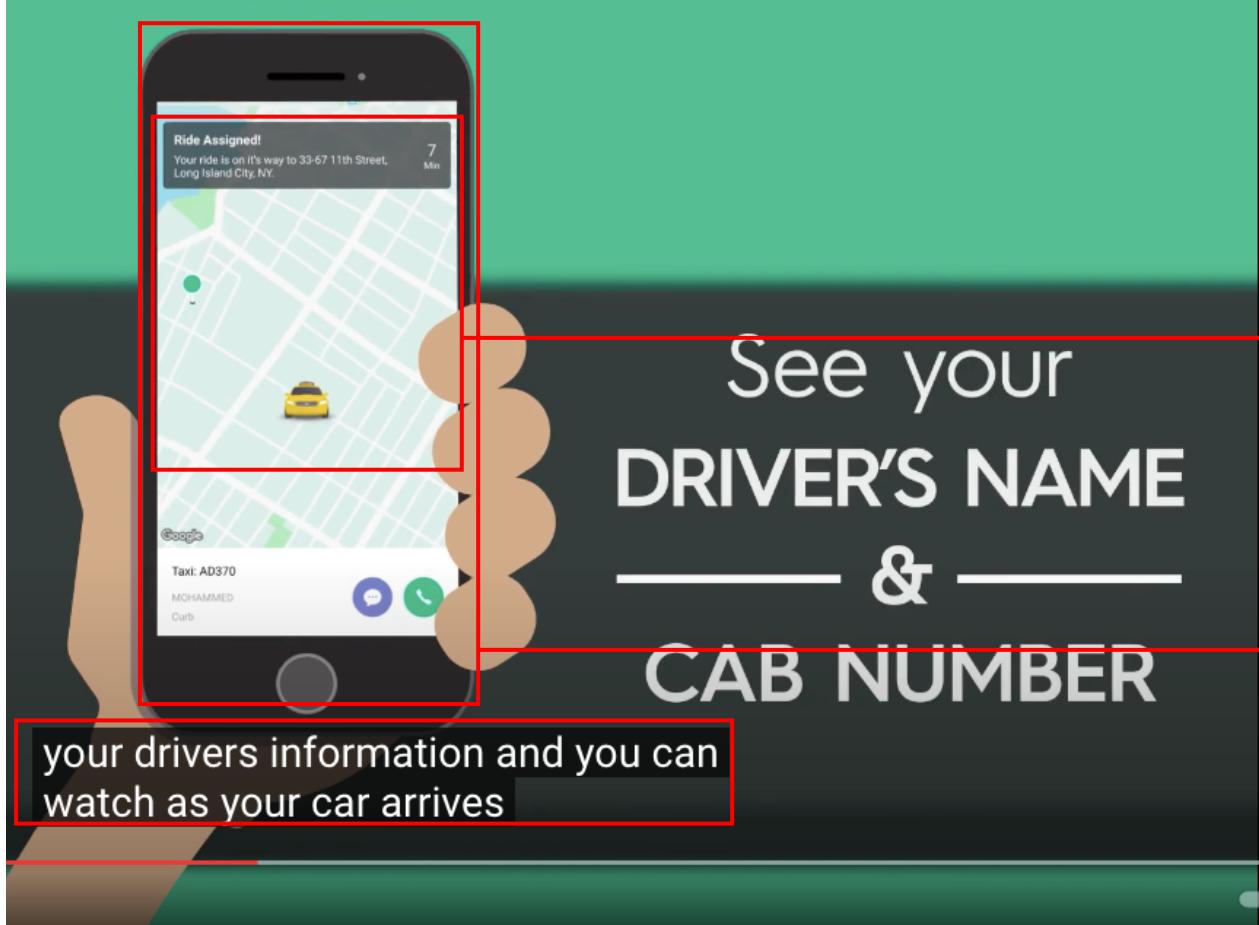
Low-cost, on-demand rides. Available in
major cities across the US.



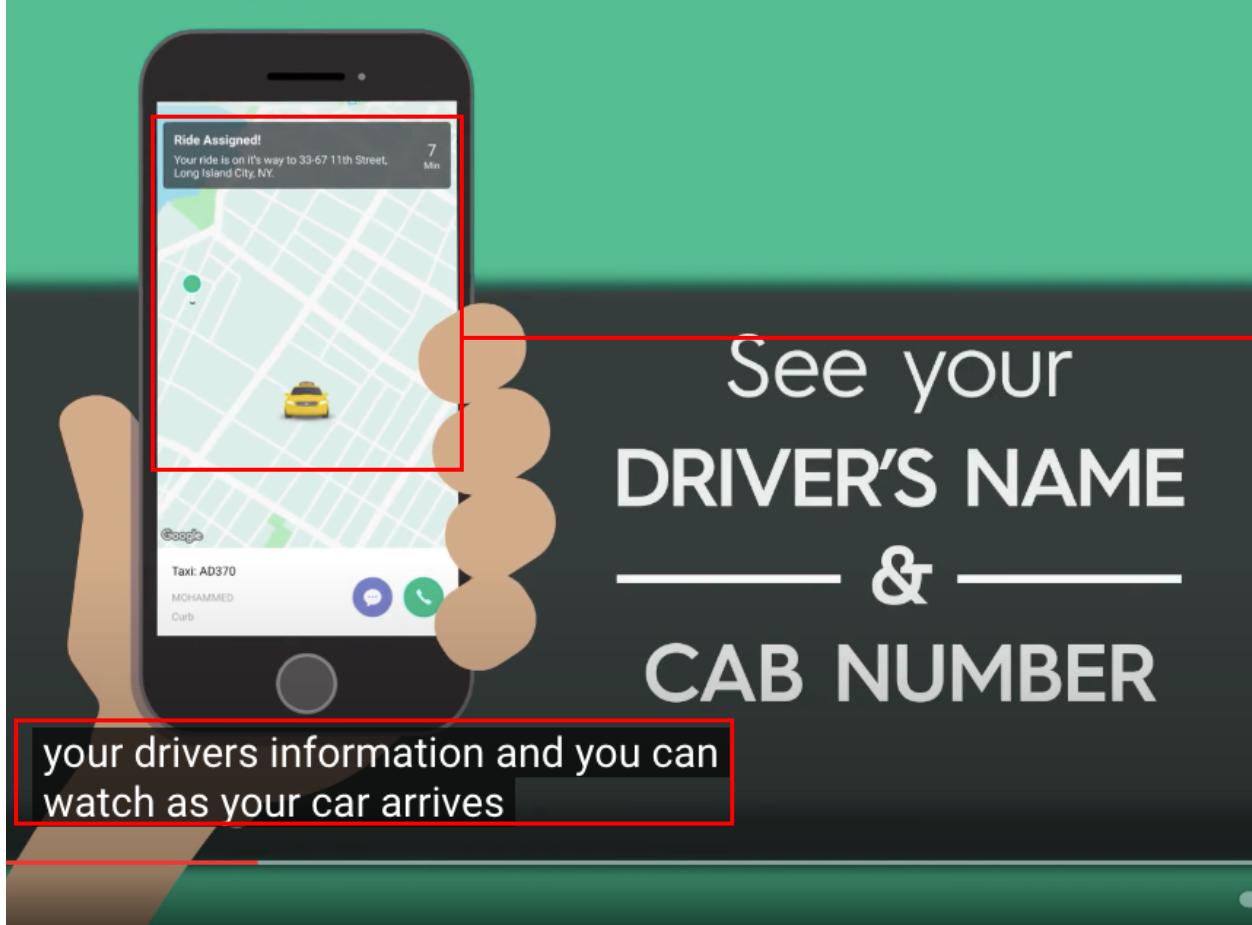
Request a ride

Tap 'Ride Now' for immediate pickup, or
tap 'Ride Later' to reserve a ride in
advance.

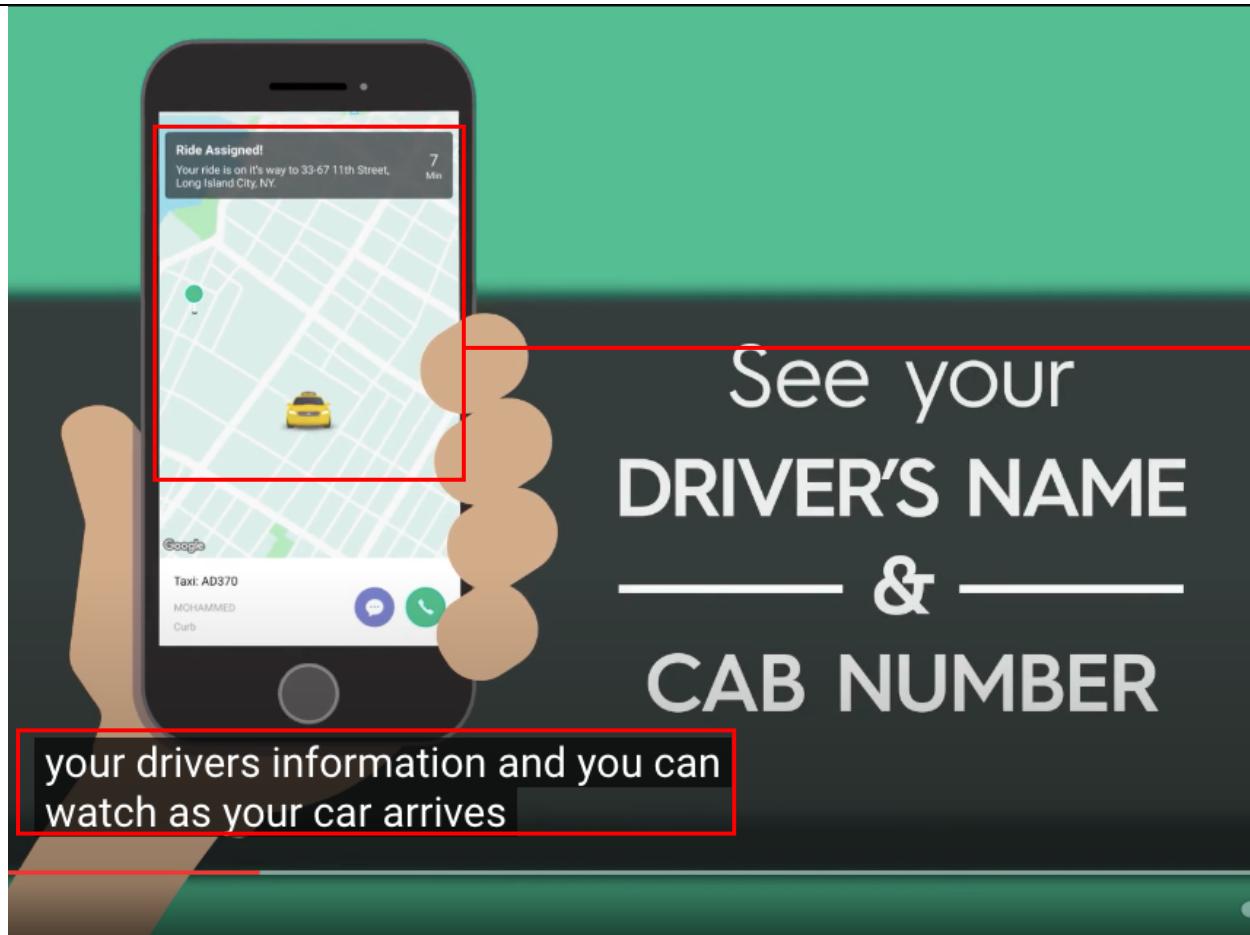
Source: <https://www.gocurb.com/>

	 <p>Source: https://www.youtube.com/watch?v=Y2ztLexoyDk at 0:16 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Company's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p> <p>[1.2] receiving at Company performs and induces others to perform the step of receiving at the requesting positional information device, from the server, a retrieved at least one address to the requesting positional information device.</p>	
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<p>the requesting positional information device, from the server, a retrieved at least one address to the requesting positional information device.</p>	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, the user tracks the real-time location (“address”) of the driver who accepts the ride request. Therefore, it would be apparent to a person having ordinary skill in the art that the server retrieves the real-time location of the driver’s mobile device and then sends the real-time location to the Curb application installed on the user’s mobile device (“receiving at the requesting positional information device, from the server, a retrieved at least one address”).</p> <p>Device data: We may collect data about the devices used to access our Platform or Services, including the hardware models, device IP addresses, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data and mobile network data.</p> <p>Source: https://www.gocurb.com/privacy</p> <p>2. Data created during use of our Platform or Services, which includes:</p> <p>Location data: We collect precise or approximate location data from a user’s mobile device if enabled by the user to do so. For drivers, CML collects this data either from CML equipment installed in the vehicles or when the Curb® driver App is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile devices. For passengers, CML</p> <p>Source: https://www.gocurb.com/privacy</p>
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	 <p>a retrieved at least one address</p> <p>your drivers information and you can watch as your car arrives</p>	
		Source: https://www.youtube.com/watch?v=Y2ztLexoyDk at 0:16 (annotated)
Further, to the extent this element is performed at least in part by Company's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.		
[1.4] wherein the server determines a	Company performs and induces others to perform the step wherein the server determines a second identifier for identifying the at least one sending positional information device based on the received first identifier and retrieves the requested at least one address stored in the identified at least one sending positional information device.	

<p>second identifier for identifying the at least one sending positional information device based on the received first identifier and retrieves the requested at least one address stored in the identified at least one sending positional information device.</p>	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when the user requests a ride, the request is forwarded to nearby drivers (“identifying the at least one sending positional information device”). Further, the real-time location (“the requested at least one address stored in the identified at least one sending positional information device”) of the nearby driver who accepts the ride request is then shared with the user. Since both users and drivers have unique device IDs, upon information and belief, during the ride booking process, the server utilizes the user's unique device identifier (“first identifier”) to determine which drivers are nearby to serve the user's ride request and the unique device identifiers of nearby drivers (“second identifier”) are determined based on the user's unique device identifier (“server determines a second identifier for identifying the at least one sending positional information device based on the received first identifier”).</p> <p>Device data: We may collect data about the devices used to access our Platform or Services, including the hardware models, device IP addresses, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data and mobile network data.</p> <p>Source: https://www.gocurb.com/privacy</p> <p>2. Data created during use of our Platform or Services, which includes:</p> <p>Location data: We collect precise or approximate location data from a user's mobile device if enabled by the user to do so. For drivers, CML collects this data either from CML equipment installed in the vehicles or when the Curb® driver App is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile devices. For passengers, CML</p> <p>Source: https://www.gocurb.com/privacy</p>
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Source: <https://www.youtube.com/watch?v=Y2ztLexoyDk> at 0:16 (annotated)

Further, to the extent this element is performed at least in part by Company's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

the requested at least one address stored in the identified at least one sending positional information device

2. List of References

1. <https://www.gocurb.com/>, last accessed on June 27, 2024.
2. <https://www.gocurb.com/privacy>, last accessed on June 27, 2024.
3. <https://www.youtube.com/watch?v=Y2ztLexoyDk>, last accessed on June 27, 2024.